

# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CESAR FERNANDEZ-RODRIGUEZ, ROBER  
GALVEZ-CHIMBO, SHARON HATCHER,  
JONATHAN MEDINA, and JAMES WOODSON,  
individually and on behalf of all others similarly  
situated,

Petitioners,

-v.-

MARTI LICON-VITALE, in her official capacity  
as Warden of the Metropolitan Correctional Center,

Respondent.

No. 20 Civ. 3315

**DECLARATION OF SHARON  
HATCHER**

SHARON HATCHER declares the following under penalty of perjury and pursuant to 28  
U.S.C. § 1746:

1. My name is SHARON HATCHER and I have been an inmate at the Metropolitan Correctional Center (“MCC”) since July 25, 2018. My Registration Number is 85973-054. I have been housed in the Women’s Housing Unit since arriving here.
2. I was sentenced on March 4, 2020. I was told that I will be sent to another prison to serve my sentence but I do not know which one it will be.
3. I am 53 years old and I am in not in good health. I am HIV positive, and I suffer from Chronic Obstructive Pulmonary Disease (“COPD”). I am also clinically obese and have high blood pressure and high cholesterol. I am currently prescribed eight different medications for my health issues.

4. Because of my COPD I get a lot of upper respiratory infections. In the past, I have been hospitalized because I was having problems breathing.
5. I share my small cell with another inmate. My cellmate and I share a toilet and a sink.
6. For almost a month, my housing unit has been under quarantine. We are locked in our cells for as many as 23 hours a day, including at mealtimes, but we still share common spaces like the shower. They do not disinfect the showers between use.
7. We also all use the same phones and computers. The phones and computers are not sanitized in between uses.
8. We are given one thin surgical mask a week to wear.
9. We get one or two very small bars of soap when they have it, but that is not every week.  
If we want extra soap we have to pay for it and there are limits on how much soap we can buy.
10. We have not been given hand sanitizer or tissues, even recently.
11. I don't know of anyone in my unit having been tested for COVID-19, even people who seem sick.
12. This declaration was prepared by attorney Timothy Sprague based on my statements to him. Mr. Sprague read it to me and I agreed it was correct.

Executed on: April 24, 2020  
New York, NY

As reported by Sharon Hatcher to  
Timothy C. Sprague of Covington &  
Burling LLP



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